Case 1:20-cv-02089-VEC Document 15 Filed 06/18/20

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## **VIA ECF**

**MEMO ENDORSED** 

The Honorable Valerie Caproni, United States District Judge United States District Court for the Southern District of New York 40 Foley Square, Room 240, Courtroom 443 New York, NY 10007

> Wuhu Changjia Investment Fund, LLP v. Centrisys Capital, Inc. Case No.: 1:20-cv-02089-VEC

Dear Judge Caproni:

This office represents defendant Centrisys Capital, Inc. in this matter. We write with regard to: 1) scheduling of the initial pretrial conference and 2) the briefing schedule for defendant's intended motion to dismiss the plaintiff's First Amended Complaint.

The initial pretrial conference in this matter is presently scheduled for June 26, 2020. Pursuant to Your Honor's May 21, 2020 Order (Doc. 13), issued upon the plaintiff's filing of its First Amended Complaint, defendant's deadline for responding to the amended complaint is June 19, 2020 and defendant intends to file a motion to dismiss on that date. Defendant therefore respectfully requests that the conference be adjourned. We have communicated with counsel for the plaintiff, and the plaintiff neither opposes nor joins in this request provided that defendant requests an **alternate conference date of August 28, 2020**, which we understand would make **the parties' joint submission due August 20, 2020**. Please note that defendant had previously moved to dismiss the plaintiff's initial complaint, and prior to that motion, the parties requested an adjournment of the conference, so this is the second request for an adjournment.

We also write with respect to the briefing schedule for defendant's motion to dismiss. Pursuant to Your Honor's May 21, 2020 Order (Doc. 13), the motion is to be filed by June 19, 2020, with plaintiff's opposition due July 3, 2020 and defendant's reply due July 13, 2020. The parties have conferred, and because this motion is likely to involve briefing of additional issues and may overlap with vacation schedule, the parties request a revised briefing schedule whereby:

- plaintiff's opposition to defendant's motion to dismiss is due on or before July 17, 2020; and,
- defendant's reply is due on or before August 3, 2020.

The Honorable Valerie Caproni, U.S.D.J. June 18, 2020

This is the first request for an extension of this briefing schedule.

Please let us know if the requests to adjourn the initial pretrial conference and for the extended briefing schedule may be granted. Thank you.

Respectfully submitted,

Kerry J. Kaltenbach

KJK/

Application GRANTED. The above briefing schedule is adopted. The initial pretrial conference is adjourned to August 28, 2020 at 10:00 a.m. The parties' joint submissions are due August 20, 2020.

SO ORDERED.

HON. VALERIE CAPRONI UNITED STATES DISTRICT JUDGE

6/18/2020